IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

VS.

CRIMINAL NO. 3:18-cr-00123 DPJ-FKB

ROGELIO SANCHEZ-VILLAGREZ

DEFENDANT

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW ROGELIO SANCHEZ-VILLAGREZ, Defendant herein, by and through undersigned counsel, and files this his Unopposed Motion to Continue the Trial of this case and all corresponding deadlines, and in support thereof would show unto the Court the following:

- 1. That this case is presently set for trial on Monday, August 20, 2018 at 9:00 a.m., in the United States District Court in Jackson, Mississippi; and a pretrial conference is set for Thursday, July 19, 2018 at 8:30 a.m.
- 2. That counsel for the defense was only recently appointed to represent the Defendant in this matter and has not yet received discovery, as of the date of the filing of this motion.
- 3. That counsel for the Defendant needs additional time to obtain the discovery, meet with his client, and to otherwise adequately prepare this case for trial.
- 4. In addition, counsel for the Defendant has a conflict in the form of a previously scheduled trial in State court on this same date and time, August 20, 2018 at 9:00 a.m.
- 5. That counsel has conferred with the attorney for the government and there is no objection to the relief requested by this motion on the part of the government.
 - 6. That the Defendant expressly waives his right to a speedy trial herein.

Based on the foregoing, counsel submits that by granting this motion, the ends of justice are served in that the right of the Defendant to a fair trial outweighs the public's right to a speedy trial.

WHEREFORE, PREMISES CONSIDERED, counsel for the Defendant Rogelio Sanchez-Villagrez respectfully moves this Honorable Court to enter an order continuing the trial of this case and the corresponding deadlines.

RESPECTFULLY SUBMITTED, this the <u>18th</u> day of <u>July</u>, 2018.

/s/ Joe M. Hollomon

JOE M. HOLLOMON, ATTORNEY FOR AND ON
BEHALF OF ROGELIO SANCHEZ-VILLAGREZ

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Joe M. Hollomon, do hereby certify that I have this date electronically filed the foregoing *Unopposed Motion for Continuance* with the Clerk of the Court using the Electronic Case Filing (ECF) system, which sent notification of such filing to all counsel of record.

THIS, the $\underline{18^{th}}$ day of \underline{July} , 2018.

____/s/Joe M. Hollomon JOE M. HOLLOMON, ESQ.